

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Structure and Practices of the)	CG Docket No. 10-51
Video Relay Service Program)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
With Hearing and Speech Disabilities)	
_____)	

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

CSDVRS, LLC (d/b/a ZVRS, “ZVRS”) joins the Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Deaf and Hard of Hearing Consumer Advocacy Network, and California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc.’s (collectively, “Consumer Groups”) in respectfully requesting that the Federal Communications Commission (“Commission”) extend the deadline for filing comments and reply comments in response to the Further Notice of Proposed Rulemaking (“FNPRM”).¹

The changes proposed in the FNPRM will definitely and decisively impact the access and quality of VRS for consumers. ZVRS supports providing Consumer Groups the time they requested to develop and provide comment on issues which materially affect their civil right to telecommunications relay service. The rationale for the extension

¹ *In the Matter of Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Further Notice of Proposed Rulemaking, CG Docket Nos. 10-51 and 03-123; FCC 11-184, 77 FR 4948, (“FNPRM”) (2012). The Consumer Groups motion was filed on February 13, 2012, CG Docket Nos. 10-51 and 03-123.

presented by the Consumer Groups is legitimate and the requested extension period very modest in light of the significance of the matters being considered.

ZVRS is of view that far too many VRS stakeholders are not fully aware of the FNPRM's proposals and will not have the opportunity to provide their input prior to the end of the comment period. ZVRS believes that given what is at stake, the Commission should sponsor or collaborate with interested parties on stakeholder workshops on key issues, representative surveys of consumers and/or an intensive two to three day conference prior to the comment deadline to ensure that their views will be heard as part of the rulemaking process and the Commission can make fully informed policy decisions. The FCC roundtable yesterday was an outstanding start in what was characterized as a beginning of a dialogue involving stakeholders and we look forward to that collaborative effort continuing. ZVRS has been diligently meeting with other VRS providers to explore possible ideas to support mutual objectives for the VRS program. Adequate time is needed to allow the development and exchange of information and to produce any consensus about such ideas.

Although the Commission does not routinely grant extensions of filing deadlines, it has often recognized that a pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses to the issues and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.² Such an extension is particularly warranted in light of the

² See, e.g., *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) ("we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the *NPRM* and respond to the extensive comments filed in response thereto); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*,

Commission's desire for input on so many varying critical questions relating to the VRS program. For the foregoing reasons, the public interest would be served by grant of the requested extension of the comment period.

Respectfully Submitted,

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Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd. 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003).